

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

Jose A. Cruz-Kerkado, *et al.*
Plaintiffs
v.
Commonwealth of Puerto Rico, *et al.*
Defendants

CIVIL ACTION

Case No 3:16-cv-2748
Constitutional Rights

**PLAINTIFFS' MOTION FOR LEAVE
TO FILE A SURREPLY**

To the Honorable Court:

COMES NOW, the Plaintiffs by and through the undersigned counsel and respectfully file this Motion for Court's Leave to file a Surreply to codefendant PRSA's Reply (Docket No. 34).

Codefendant Puerto Rico Shooting Association recently filed a Reply in Support of its Motion to Dismiss (Docket No. 34) on January 18, 2017, in response to our Opposition (Docket No. 30). On that same day, the United States Court of Appeals for the Seventh Circuit issued a landmark Opinion concerning the applicability of the Second Amendment protection to learn and practice firearm use in the controlled setting of a shooting range. On January 18, 2017, the Appeals Court, in *Rhonda Ezell v. City of Chicago* (Nos. 14-3312 & 14-332) struck down several restrictions which severely restricted citizens right to train in firearm use at a range. Said Opinion, which is relevant, was unavailable at the time plaintiffs filed the Opposition (Docket No. 30) and plaintiffs humbly ask for Court's leave to file a brief Surreply to codefendant PRSA Reply (Docket No. 34) See **Exhibits**.

WHEREFORE, for the reasons set forth herein, plaintiff moves the Court for an Order accepting the Surreply to codefendants' reply.

In San Juan, Puerto Rico, this 21st Day of January 2017.

Respectfully submitted,

/S/ Humberto Cobo-Estrella, Esq.
Humberto Cobo-Estrella, Esq.
USDC-PR230108
PO Box 366451
San Juan, Puerto Rico 00936-6451
Tel. (787) 200-2715
Email: hcobo@hcounsel.com

CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2017, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I further certify that a copy of the foregoing pleading and the Notice of Electronic Filing has been served by ordinary U.S. mail upon all parties for whom counsel has not yet entered an appearance electronically.

/S/ Humberto Cobo-Estrella, Esq.
Attorney for the Plaintiff